



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 20, 2020

**BY ECF**

Honorable Edward S. Kiel  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

**Re: *Hana v. United States*, 20 Cv. 536 (CCC) (ESK)**

Dear Judge Kiel:

The Government writes, jointly with counsel for Plaintiff Wael Hana, to update the Court on the status of the above-referenced matter and in response to the Court's March 17, 2020 order. (Dkt. 7). As detailed below, the parties have reached an amicable resolution and hereby request the entry of an order dismissing the case, subject to reopening within 60 days if we are unable to resolve remaining issues and finalize a settlement, pursuant to Local Rule 41.1(b).

The Government has produced forensic images of all but two of the electronic devices seized from the defendant in connection with the execution of the search warrants at issue, copies of all physical documents seized during the searches, the plaintiff's passport, and jewelry and currency seized from the plaintiff's residence. The parties are now discussing a stipulation regarding the authenticity of the items seized and copied in connection with the searches. In addition, the Government is attempting to access the two remaining devices, which it has been unable to access to date, and the defendant has agreed to provide the passwords to these devices to facilitate the search and copying of the devices. To the extent the Government is now able to access these devices, and the parties reach a stipulation concerning the electronic devices seized in connection with the searches, the Government anticipates returning to the plaintiff the electronic devices seized during the course of the searches.



Please do not hesitate to contact us, or defense counsel, if the Court has any questions or concerns with regard to the above. Thank you for your consideration of this matter.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: /s/  
Gillian Grossman / Jason Richman  
Assistant United States Attorneys  
(212) 637-2188 / 2589

cc: Lawrence S. Lustberg, Esq. and Anne M. Collart, Esq. (by ECF)